

MARY E. BOETSCH
SINAI, SCHROEDER, MOONEY,
BOETSCH, BRADLEY & PACE
448 HILL STREET
RENO, NEVADA 89501
(775) 323-5178

Attorney for Defendant
JENNIFER FRENCH

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEVADA

UNITED STATES OF AMERICA,
Plaintiff,

vs.

CASE NO. 3:08-CR-0006-LHR-RAM

MOTION TO AMEND CONDITIONS
OF RELEASE

DARIN JEROME FRENCH,
JENNIFER LYNN FRENCH,
Defendants.

COMES NOW, the Defendant, Jennifer Lynn by and through her counsel, Mary E. Boetsch, Esq., CJA, and hereby moves this Court for its Order modifying the conditions of pretrial release to permit the Defendant to travel to the Los Angeles area in the Central District of California in order to visit her husband, Darin Jerome French, who is currently incarcerated at Los Angeles Metropolitan Detention Center. This travel will be subject to advance notice and permission specifics as required by Pretrial Services.

We also ask that the conditions of pretrial release be amended to permit travel to other destinations, primarily in

SINAI, SCHROEDER, MOONEY, BOETSCH,
BRADLEY & PACE
AN ASSOCIATION OF LAW OFFICES
448 HILL STREET
RENO, NEVADA 89501
(775) 323-5178 • (775) 323-0709 FACSIMILE


SINAI, SCHROEDER, MOONEY, BOETSCH,
BRADLEY & PACE
AN ASSOCIATION OF LAW OFFICES
448 HILL STREET
RENO, NEVADA 89501
(775) 323-5178 • (775) 323-0709 FACSIMILE

Northern California, with the pre-approval of Pretrial Services. This request is to allow Ms. French to take her children to their physicians and to occasionally visit with relatives and the children's godparents.

In addition, we ask that the conditions of pretrial release be amended to also permit travel between Susanville and Reno. Currently, the conditions limit travel between Truckee and Reno, as they were not amended after Ms. French returned to Susanville.

Undersigned counsel has discussed this with both Ms. Simone with Pretrial Services and with William Reed, Esq., Assistant United States Attorney, and Megan Rachow, Esq., Assistant United States Attorney. All have indicated their approval of these changes.

DATED this 10th day of June 2010.


MARY E. BOETSCH, ESQ.
Counsel for Defendant
Jennifer Lynn French

IT IS SO ORDERED.

DATED this 6th day of July, 2010.


UNITED STATES MAGISTRATE JUDGE